

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

PURDUE PHARMA L.P., *et al.*,

Debtors.¹

Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

**SIXTH SUPPLEMENTAL DECLARATION OF
LISA DONAHUE OF ALIXPARTNERS, LLP**

Pursuant to 28 U.S.C. § 1746, I, Lisa Donahue, state under penalty of perjury, that:

1. I am a Managing Director of AlixPartners, LLP (“**AlixPartners**”), which has a place of business at 909 Third Avenue, Floor 30, New York, New York 10022.
2. Except as otherwise noted, I have personal knowledge of the matters set forth herein and, if called as a witness, would testify competently thereto.
3. I submit this supplemental declaration in the cases of the above-captioned debtors (collectively, the “**Debtors**”) to supplement the disclosures set forth in my original declaration dated November 5, 2019 [ECF No. 429], my supplemental declaration dated December 5, 2019 [ECF No. 578], the supplemental declaration of Jesse DelConte of AlixPartners, LLP dated December 18, 2019 [ECF No. 671], my supplemental declaration dated December 19, 2019 [ECF No. 678], and my supplemental declaration dated December 15, 2020 [ECF No. 2137].

¹ The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

4. Unless otherwise noted, references to AP below collectively refer to AlixPartners, AP Holdings and each of their respective subsidiaries. AlixPartners would like to disclose the following:

- A Plus Corporation, a customer to the Debtors, is a former employer of current AP employees.
- Alabama Medicaid Agency, a vendor to the Debtors, is an adverse litigation party to current AP clients in matters unrelated to the Debtors.
- Alamosa County, a plaintiff to the Debtors, is a litigation party to current AP clients in matters unrelated to the Debtors.
- Analysis Group Inc., a vendor to the Debtors, is a professional to current AP clients in matters unrelated to the Debtors. Analysis Group is a former employer of current AP employees.
- Ariba Inc., a vendor to the Debtors, is a former employer of current AP employees.
- Arizona Department of Revenue, a taxing authority to the Debtors, is a litigation party and bondholder to current AP clients in matters unrelated to the Debtors.
- Arizona State Board of Pharmacy, a taxing authority to the Debtors, is a bondholder to current AP clients in matters unrelated to the Debtors.
- Balch & Bingham, a professional in these bankruptcy cases, is an adverse litigation party, opposing counsel, professional and lessor to current and former AP clients in matters unrelated to the Debtors.
- Barrack Rodos and Bacine, a professional in these bankruptcy cases, is a professional and opposing counsel to current and former AP clients in matters unrelated to the Debtors.
- Bell Law Firm, a professional in these bankruptcy cases, is a professional to current AP clients in matters unrelated to the Debtors.
- Brownstein Hyatt Farber Schreck LLP, a vendor to the Debtors, is a professional and adverse litigation party to current AP clients in matters unrelated to the Debtors.
- Caplin and Drysdale, a professional in these bankruptcy cases, is a professional to current AP clients in matters unrelated to the Debtors. Caplin and Drysdale is a current AP client in matters unrelated to the Debtors.
- Cohen & Malad, a professional in these bankruptcy cases, is a litigation party to current AP clients in matters unrelated to the Debtors.

- Cole Schotz LP, a professional in these bankruptcy cases, is a professional and counsel to current AP clients in matters unrelated to the Debtors.
- Compass Lexecon, a professional in these bankruptcy cases, is a professional and litigation party to current AP clients in matters unrelated to the Debtors.
- CVS Health Corporation (“CVS”) is a current AP client wherein AP is retained as a rebuttal expert by Zuckerman Spaeder, LLP as counsel to CVS regarding its shipments and dispensing data, in various opiate litigation matters. AP implemented an information barrier to maintain separate engagement teams and to prevent the flow of information between AP’s engagement with CVS and AP’s engagement as financial advisor in these Chapter 11 cases.
- Dentons US LLP, a vendor to the Debtors, is a professional and counsel to current AP clients in matters unrelated to the Debtors.
- Department of Veterans Affairs, a vendor to the Debtors, is an adverse litigation party to current AP clients in matters unrelated to the Debtors.
- Dominion Energy, a utility provider to the Debtors, and affiliates, are bondholders and adverse litigation parties to current and former AP clients in matters unrelated to the Debtors.
- Dreyfuss Funds, an investment bank to the Debtors, is an adverse litigation party to current AP clients in matters unrelated to the Debtors.
- ECG Inc, a vendor to the Debtors, is an adverse litigation party to current AP clients in matters unrelated to the Debtors.
- Eisai and Eisai Inc, vendors and business developers to the Debtors, are current AP clients in matters unrelated to the Debtors.
- Fears Nachawati, a professional in these bankruptcy cases, is opposing counsel to current AP clients in matters unrelated to the Debtors.
- Ferraro Law firm, a professional in these bankruptcy cases, is a professional to current AP clients in matters unrelated to the Debtors.
- Florida Department of Revenue, a taxing authority to the Debtors, is a litigation party to current AP clients in matters unrelated to the Debtors.
- Georgia Department of Community Health, a creditor to the Debtors, is an adverse litigation party to current AP clients in matters unrelated to the Debtors.
- Giant Eagle, a customer to the Debtors, is a litigation party and an adverse litigation party to current AP clients in matters unrelated to the Debtors.

- Gray & White, a professional in these bankruptcy cases, is a shareholder to current AP clients in matters unrelated to the Debtors.
- Gullet Sanford, a professional in these bankruptcy cases, are professionals to current AP clients in matters unrelated to the Debtors.
- Heb Grocery Co., a customer to the Debtors, is a lessor and litigation party to current and former AP clients in matters unrelated to the Debtors.
- Heyman Group LLC, a vendor to the Debtors, is a current AP client in matters unrelated to the Debtors.
- Houlihan Lokey, a professional in these bankruptcy cases, and affiliates (“**Houlihan Lokey**”), are professionals and investors to current AP clients in matters unrelated to the Debtors. Houlihan Lokey is a current and former AP client in matters unrelated to the Debtors. Houlihan Lokey is a former employer of current AP employees. Houlihan Lokey is a vendor to AP.
- Hull Barrett PC, a professional in these bankruptcy cases, is a professional to current AP clients in matters unrelated to the Debtors.
- Hutchens Law Firm, a professional in these bankruptcy cases, is a litigation party to current AP clients in matters unrelated to the Debtors.
- Intl. Business Machines Corp, a vendor to the Debtors, and affiliates (“**IBM**”), are litigation parties and adverse litigation parties to current and former AP clients in matters unrelated to the Debtors. IBM is a current and former AP client in matters unrelated to the Debtors. IBM is a former employer of current AP employees. IBM is a vendor to AP.
- Intralinks Inc, a vendor to the Debtors, is a professional to current AP clients in matters unrelated to the Debtors.
- Johnson & Johnson PLLC (“**Johnson & Johnson**”), a professional in these bankruptcy cases, is a current and former AP client in matters unrelated to the Debtors. Johnson & Johnson is a former employer of current AP employees.
- Kaiser Foundation Hospital, a vendor to the Debtors, is a shareholder to current AP clients in matters unrelated to the Debtors.
- Karr Tuttle Campbell, a vendor to the Debtors, is counsel to current AP clients in matters unrelated to the Debtors.
- KPMG LLP, a vendor to the Debtors, and affiliates (“**KPMG**”), are professionals, parents and adverse litigation parties to current and former AP clients in matters unrelated to the Debtors. KPMG is a current and former AP client in matters unrelated to the Debtors. KPMG is a former employer of current AP employees. KPMG provides auditing services to AP. KPMG is a vendor to AP.

- Kurtzman Carson Consultants LLC, a professional in these bankruptcy cases, and affiliates (“**Kurtzman**”), are professionals to current and former AP clients in matters unrelated to the Debtors. Kurtzman is a former employer of current AP employees.
- Lanier Law, a professional in these bankruptcy cases, is a professional to current AP clients in matters unrelated to the Debtors.
- Louisiana Health Services, an insurance provider to the Debtors, is an adverse litigation party to current AP clients in matters unrelated to the Debtors.
- LTS Lohmann and LTS Lohmann Therapy Systems Corporation, UCC members and business developers to the Debtors, are adverse litigation parties to current AP clients in matters unrelated to the Debtors. LTS Lohmann is a current AP client in matters unrelated to the Debtors.
- Marcus & Mack, a professional in these bankruptcy cases, is a litigation party and lessor to current AP clients in matters unrelated to the Debtors.
- Marina Tortorello & Boyle PC, a vendor to the Debtors, is counsel to current AP clients in matters unrelated to the Debtors.
- McBrayer, McGinnis, Leslie & Kirkland PLLC, a professional in these bankruptcy cases, is a litigation party to current AP clients in matters unrelated to the Debtors.
- McGuire Woods LLP, a vendor to the Debtors, is a professional to current AP clients in matters unrelated to the Debtors.
- McMaster Carr Supply Company (“**McMaster Carr**”), a vendor to the Debtors, is an adverse litigation party to former AP clients in matters unrelated to the Debtors. McMaster Carr is former employer of current AP employees.
- Mercer Health & Benefits LLC, a vendor to the Debtors, and affiliates, is a vendor to current AP clients in matters unrelated to the Debtors.
- Morrow Morrow Ryan Bassett & Haik, a professional in these bankruptcy cases, is an adverse litigation parties to current AP clients in matters unrelated to the Debtors.
- Nevada Department of Taxation, a taxing authority to the Debtors, is a bondholder to current and former AP clients in matters unrelated to the Debtors.
- New York Department of Health, a taxing authority to the Debtors, is an adverse litigation parties to current AP clients in matters unrelated to the Debtors.
- Nix Patterson & Roach, a professional in these bankruptcy cases, is a professional to current AP clients in matters unrelated to the Debtors.

- Otterbourg PC, a professional in these bankruptcy cases, is a professional to current AP clients in matters unrelated to the Debtors.
- Paul Hastings LLP, a vendor to the Debtors, and affiliates (“**Paul Hastings**”), are professionals, counsel and opposing counsel to current and former AP clients in matters unrelated to the Debtors. Paul Hastings is a current and former AP client in matters unrelated to the Debtors.
- Pension Benefit Guarantee Corp and Pension Benefit Guarantee Corporation, government authorities, creditors and vendors to the Debtors, and affiliates (“**PBGC**”), are litigation parties to current and former AP clients in matters unrelated to the Debtors. PBGC is a member of a UCC represented by AP in Bon-Ton Stores, Inc., The Great Atlantic & Pacific Tea Co., Windstream Holdings, Inc. and VSI Liquidating Trust, current and former bankruptcy matters unrelated to the Debtors.
- Perrin Landry Dalauney, a professional in these bankruptcy cases, is a professional to former AP clients in matters unrelated to the Debtors.
- Pfaudler Inc, a vendor to the Debtors, is an adverse litigation party to former AP clients in matters unrelated to the Debtors.
- Phillips ADR and Phillips ADR Enterprises PC, professionals in this bankruptcy matter and vendors to the Debtors, are professionals to current AP clients in matters unrelated to the Debtors.
- Pillsbury Winthrop Shaw Pittman LLP, a professional in these bankruptcy cases (“**Pillsbury**”), is a professional, counsel and opposing counsel to current and former AP clients in matters unrelated to the Debtors. Pillsbury is a current and former AP client in matters unrelated to the Debtors.
- PRA Inc, a vendor to the Debtors, is an adverse litigation party to current AP clients in matters unrelated to the Debtors.
- Price Chopper, a customer to the Debtors, is a current AP client in matters unrelated to the Debtors.
- Shipman & Goodwin, a professional in these bankruptcy cases, is a professional to current AP clients in matters unrelated to the Debtors.
- Simmons Hanley Conroy and Simmons Hanley Conroy LLC, professionals in these bankruptcy cases and creditors to the Debtors, are professionals to current AP clients in matters unrelated to the Debtors. Simmons Hanley is a current AP client in matters unrelated to the Debtors.
- Skinner Law, a professional in these bankruptcy cases, is a professional to current AP clients in matters unrelated to the Debtors.

- Smith & Johnson, a professional in these bankruptcy cases, is a professional, counsel, litigation party and adverse litigation party to current AP clients in matters unrelated to the Debtors.
- Smith Stag, a professional in these bankruptcy cases, is an adverse litigation party to current AP clients in matters unrelated to the Debtors.
- Stevens Lee, a professional in these bankruptcy cases, are opposing counsel and director-affiliated companies to current AP clients in matters unrelated to the Debtors.
- Thornton Law Firm, a professional in these bankruptcy cases, is a professional to current AP clients in matters unrelated to the Debtors.
- Tucker Long PC, a professional in these bankruptcy cases, is an adverse litigation party to current AP clients in matters unrelated to the Debtors.
- United States Treasury, a vendor to the Debtors, is a former employer of current AP employees.
- University of South Florida, a vendor to the Debtors, is an adverse litigation party to current AP clients in matters unrelated to the Debtors.
- Utah AG's Office and Utah Attorney General's Office, state attorneys general and adverse litigation parties to the Debtors, are adverse litigation parties to former AP clients in matters unrelated to the Debtors.
- Waters Kraus & Paul, a professional in these bankruptcy cases, is a current AP client in matters unrelated to the Debtors.
- Weitz & Luxemberg, a professional in these bankruptcy cases, is a professional to current AP clients in matters unrelated to the Debtors.
- West Virginia Dept of Health & Human Resources, a vendor to the Debtors, are adverse litigation parties to current AP clients in matters unrelated to the Debtors.
- White & Case LLP, a professional in these bankruptcy cases, ("White & Case"), is counsel, opposing counsel and a professional to current and former AP clients in matters unrelated to the Debtors. White & Case is a current and former AP client in matters unrelated to the Debtors. White & Case is a former employer of current AP employees.
- Wilentz Goldman & Spitzer, a professional in these bankruptcy cases, is a professional to current AP clients in matters unrelated to the Debtors.
- Willis Towers Watson US LLC, a vendor to the Debtors, is a professional to current AP clients in matters unrelated to the Debtors.

- Wilmer Cutler Pickering Hale and Dorr LLP, a Debtors' professional in these bankruptcy cases, is counsel and a professional to current and former AP clients in matters unrelated to the Debtors.
- Winn Dixie, a customer to the Debtors, is an adverse litigation party to current AP clients in matters unrelated to the Debtors.
- ZS Associates Inc., a vendor to the Debtors, is a former employer to current AP employees.

5. AlixPartners does not believe that the supplemental disclosures above impact its disinterestedness. I continue to reserve the right to supplement AlixPartners' disclosures in the event that AlixPartners learns of any additional connections that require disclosure. If any new material relevant facts or relationships are discovered or arise, AlixPartners will promptly file a supplemental declaration pursuant to Bankruptcy Rule 2014(a).

I declare under penalty of perjury pursuant to 28 U.S.C. §1746 that the foregoing is true and correct.

Dated: March 10, 2021
New York, New York

AlixPartners, LLP

/s/ Lisa Donahue
Lisa Donahue
Managing Director